


**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO**

Affidavit in Support of Complaint

The affiant, Jose M. Diaz, being duly sworn, does hereby state and depose as follows:


1. I am a Special Agent (SA) with the U.S. Immigration and Customs Enforcement, Homeland Security Investigations (hereinafter ICE/HSI). I have been employed with ICE/HSI as a Special Agent since April 3, 2016. I graduated from the twelve-week (12) full time residence "Criminal Investigator Training Program" and from the fourteen-week (14) Homeland Security Investigations (HSI), Special Agent Training Program, conducted at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA in October 2016. I have a Bachelor Degree in Criminal Justice Administration from Park University in Parkville, Missouri.
2. I am presently assigned to Homeland Security Investigations (HSI), SAC, San Juan, Airport Investigations and Tactical Team (AirTAT). The AirTAT investigates international drug trafficking and money laundering organizations that utilize the aviation domain to smuggle narcotics and currency into and through the United States.
3. As a Special Agent my duties and responsibilities include conducting investigations of: alleged manufacturing, distributing or possession of controlled substances (Title 21, United States Code, Sections 841 (a)(1)); conspiracy to distribute a narcotic drug controlled substances into the United States (Title 21, United States Code, Section 846); importation of controlled substances (Title 21, United States Code, Section 952(a); smuggling of goods into the United States (Title 18, United States Code, Section 545); failure to declare (31 United States Code 5316), money laundering (18 United States Code 1956), bulk cash smuggling (31 United States Code 5332), alien smuggling (8 United States Code 1324), entry without inspection (8 United States Code 1325) and related offenses.
4. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation; on information conveyed to me by other law enforcement officials; and on my review of records, documents, and other physical evidence obtained during this investigation. This affidavit is not intended to include every fact observed by me or known by the government.
5. On September 13, 2017, Andres HERNANDEZ-Montero, a Dominican Republic Citizen, while attempting to board a private chartered aircraft (CESSNA 650) registration number N989PT at the Isla Grande Airport, in San Juan, Puerto Rico with destination to the Dominican Republic. HERNANDEZ-Montero was interviewed by Customs and Border Protection Officers (CBPO).

6. CBPOs advised HERNANDEZ-Montero of the currency reporting requirements in his native language (Spanish), which HERNANDEZ-Montero declared he was traveling with \$500.00 in US currency. Subsequently, after a thorough inspection of HERNANDEZ-Montero and the aircraft, CBPO found approximately \$740,000.00 in US currency. HERNANDEZ-Montero admitted he knew he was transporting the currency and that he had placed it inside the aircraft.
7. Based upon my training, experience, and facts concerning this investigation, I believe that sufficient probable cause exists to show that there is material evidence present of a commission of a violation of a Federal Law to wit, Bulk Cash Smuggling Title 31, United States Code Section 5332 and False Statement, Title 18, United States Code Section 1001.



Jose M. Diaz, Special Agent
United States Department of Homeland Security
Immigration and Customs Enforcement
Homeland Security Investigations

Sworn and subscribed to me this 14th day of September, 2017, in San Juan, Puerto Rico



Camille Velez-Rive
UNITED STATES MAGISTRATE JUDGE
DISTRICT OF PUERTO RICO